

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ROLLIE BUCHANAN, DAVIN CARD, KIM
AND FRED MARTIN FERGUSON, KEVIN
FLYNN, PHILIPPE GEYSKENS, ROBERT
HOFFMAN, ERIC and MARIELA
KOTOUN, ARTHUR KRICHEVSKY,
ELSIE SAKS, STEVEN SALHANICK,
MARK SILBER, ROBERT and TONI
TUBBE, and DONNA URBEN, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

Volvo Car USA, LLC, Volvo Cars of North
America, LLC, and Volvo Personvagnar AB, *et
al.*,

Defendants.

Case No. 2:22-cv-02227-KM-JSA

**STIPULATION AND [PROPOSED] ORDER REGARDING DEFENDANTS' DEADLINE
TO RESPOND TO THE AMENDED COMPLAINT**

IT IS HEREBY STIPULATED by and between Plaintiffs Rollie Buchanan, Davin Card, Kim and Fred Martin Ferguson, Kevin Flynn, Philippe Geyskens, Robert Hoffman, Eric and Mariela Kotoun, Arthur Krichevsky, Elsie Saks, Steven Salhanick, Mark Silber, Robert and Toni Tubbe, and Donna Urben ("Plaintiffs") and Defendants Volvo Car USA LLC and Volvo Cars of North America, LLC ("Defendants"), by and through their respective counsel of record, that:

WHEREAS, on April 15, 2022, Plaintiffs filed their Class Action Complaint (Dkt. No. 1);

WHEREAS, on July 22, 2022, Plaintiffs filed their First Amended Class Action Complaint ("FAC");

WHEREAS, the FAC contains 951 paragraphs, includes allegations by 5 named plaintiffs, and 32 causes of action;

WHEREAS, the current deadline for Defendants to respond to Plaintiffs' Complaint is August 22, 2022;

WHEREAS, the Parties have engaged, and continue to engage, in substantive and productive discussions regarding Plaintiffs' claims in this case;

WHEREAS, pursuant to these conversations, Defendants decided to answer the FAC rather than file a pleading challenge at this time;

WHEREAS, in order to prepare an appropriate answer to each of the 951 paragraphs in the FAC, Defendants request that the deadline for them to answer the FAC be extended by 21 days to September 12, 2022;

WHEREAS, Plaintiffs do not oppose Defendants' request for a 21-day extension to respond to the FAC;

WHEREAS, continuing the deadline for Defendants' to respond to the FAC by 21 days, does not impact any other deadlines in this case;

THEREFORE, Defendants respectfully request, and Plaintiffs do not oppose, that the deadline for Defendants to respond to the FAC be continued to September 12, 2022.

IT IS SO STIPULATED.

Dated: August 18, 2022

Respectfully submitted,

By: /s/ Michael L. Mallow

Michael L. Mallow (NJ Bar No. 037931991)

Rachel A. Straus (*pro hac vice* forthcoming)

**SHOOK, HARDY & BACON
L.L.P.**

2049 Century Park East, Suite 3000
Los Angeles, CA 90067
Telephone: (424) 285-8330
Fax: (424) 204-9093
mmallow@shb.com
rstraus@shb.com

Attorneys for Defendants

Defendants Volvo Car USA LLC,
Volvo Cars of North America, LLC

Dated: August 18, 2022

Respectfully submitted,

By: /s/ Russell D. Paul

Russell D. Paul (NJ Bar. No.
037411989)
Abigail J. Gertner (NJ Bar. No.
019632003)
Natalie Lesser (NJ Bar No.
017882010)
Amey J. Park (NJ Bar. No.
070422014)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Fax: (215) 875-4604
rpaul@bm.net
agertner@bm.net
nlesser@bm.net
apark@bm.net

Tarek H. Zohdy (*pro hac vice*
forthcoming)
Cody R. Padgett (*pro hac vice*
forthcoming)
Laura E. Goolsby (*pro hac vice*
forthcoming)

CAPSTONE LAW APC
1875 Century Park East, Suite 1000
Los Angeles, California 90067
Tel.: (310) 556-4811
Fax: (310) 943-0396

Tarek.Zohdy@capstonelawyers.com
Cody.Padgett@capstonelawyers.com
Laura.Goolsby@capstonelawyers.com

*Attorneys for Plaintiffs and the
Proposed Classes*

ORDER

Having considered the parties' stipulation, the Court hereby orders that Defendants Volvo Car USA LLC's and Volvo Cars of North America, LLC's deadline to respond to Plaintiffs' First Amended Complaint is September 12, 2022.

IT IS SO ORDERED.

DATED: August 19, 2022

/s/ Kevin McNulty
HON. KEVIN MCNULTY